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From: [Jackson, Felicia](#)
To: [R4_SEMS_Records](#)
Subject: FW: Urgent Legal Matter from EPA -Thomas Wright III- Wright Chem Site-CERCLA 104(e) information request
Date: Wednesday, March 31, 2021 12:15:22 PM
Attachments: [Wright Chem Site- Cover Letter to 104\(e\)-Thomas Wright III-2-9-2021.pdf](#)
[Enclosure A-Wright Chem Site- 104\(e\) Thomas H. Wright III-2-9-2021.docx](#)
[Individual Financial Data Req. Form.docx](#)

From: Benjamin, Deborah <Benjamin.Deborah@epa.gov>
Sent: Tuesday, February 9, 2021 3:40 PM
To: (b) (6); (b) (6)
Cc: Zeller, Craig <Zeller.Craig@epa.gov>; Acker, Adam <acker.adam@epa.gov>; Jackson, Felicia <Jackson.Felicia@epa.gov>; Montanez, Yeliann <Montanez.Yeliann@epa.gov>
Subject: Urgent Legal Matter from EPA -Thomas Wright III- Wright Chem Site-CERCLA 104(e) information request

Dear Mr. Wright:

Attached please find the following time-sensitive legal material: EPA's Cover Letter, and Enclosure A which includes EPA's CERCLA 104(e) Questions directed to you. Also attached is an Individual Financial Data Request Form which you will need to submit to be responsive.

Please be aware that your response to this information request is mandated by law and is due within 30 calendar days. Should you have any questions pertaining to this transmission please feel free to contact me.

Sincerely,

Deborah Benjamin
Associate Regional Counsel
U.S. EPA, Region 4
404-562-9561



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

February 9, 2021

INFORMATION REQUEST
URGENT LEGAL MATTER – PROMPT REPLY NECESSARY
VIA E-MAIL:

Thomas H. Wright, III
William Gilchrist Wright Properties, Inc.
One Page Avenue, Suite 201
Asheville, North Carolina 28801

(b) (6)

(b) (6)

Re: Request for Information for the Wright Chemical Corporation Site
Riegelwood, Columbus County, North Carolina

Dear Mr. Wright:

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request attached hereto for the Wright Chemical Corporation Site located at 333 Niels Eddy Road, Riegelwood, North Carolina. Instructions on how to respond to the questions, definitions, and the questions are included in **Enclosure A**.

Compliance with the Information Request is mandatory. Failure to respond fully and truthfully to the Information Request within **30 calendar days** from the date of your receipt of this letter, or adequately to justify such failure to respond, can result in enforcement action by the EPA against you pursuant to Section 104(e) of CERCLA, 42 U.S.C. § 9604(e). This statute permits the EPA to seek the imposition of penalties of up to \$58,328.00 for each day of continued non-compliance. Please be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

Please submit your response to the Information Request to me by e-mail at benjamin.deborah@epa.gov and by e-mail to Felicia Jackson, Enforcement Project Manager, at jackson.felicia@epa.gov within **30 calendar days** from the date of your receipt of this letter. Your response should be contemporaneously submitted by mail to U.S. EPA Region 4, 61 Forsyth Street, S.W., Atlanta, Georgia 30303. This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

Due to the legal ramifications of your failure to respond properly, the EPA strongly encourages you to give this matter his immediate attention and to respond to this Information Request within the time specified above. Should you have any questions pertaining to this letter, please contact me at (404) 562-9561.

Thank you for your cooperation in this matter.

Sincerely,

DEBORAH
BENJAMIN

Digitally signed by
DEBORAH BENJAMIN
Date: 2021.02.09
15:02:26 -05'00'

Deborah Benjamin
Associate Regional Counsel

Enclosure:

- A. 104(e) Information Request Instructions, Definitions, and Questions for Thomas H. Wright, III

ENCLOSURE A – INFORMATION REQUEST FOR THOMAS H. WRIGHT, III
WRIGHT CHEMICAL CORPORATION SITE

Instructions

1. A separate response must be made to each of the questions set forth in this Information Request.
2. Precede each answer with the corresponding number of the question and the subpart to which it corresponds.
3. In answering each question, identify all documents and persons that contributed information relating to each question.
4. For each document produced in response to this Information Request indicate on the document, or in some other reasonable manner, the number of the question and the subpart to which it responds.
5. If information not known or not available to you as of the date of submission of a response to this Information Request should later become known or available, you must supplement your response to the EPA. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify the EPA thereof as soon as possible.
6. The information requested herein must be provided notwithstanding its possible characterization as confidential information or trade secrets. You may, if you desire, assert a business confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. Sections 9604(e)(7)(E) and (F); Section 3007(b) of RCRA, 42 U.S.C. Section 6927(b); and 40 C.F.R. Section 2.203(b).

To make a confidentiality claim, please write or type "CONFIDENTIAL" on all confidential responses and any related confidential documents. Confidential portions of otherwise nonconfidential documents should be clearly identified. You should indicate a date, if any, after which the information need no longer be treated as confidential. Please submit your response so that all nonconfidential information, including any redacted versions of documents are in one envelope, and all materials for which you desire confidential treatment are in another envelope.

If no such claim accompanies the information when it is received by the EPA, it may be made available to the public by the EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

7. Personnel, medical files, and similar files in which the disclosure to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information."
8. Where specific information has not been memorialized in any document, but is nonetheless

responsive to a question, you must respond to the question with a written response.

9. If information responsive to this Information Request is not in your possession, custody, or control, then identify the person from whom such information may be obtained

10. If you have objections to some or all of the questions within the Information Request, you are still required to respond to each of the questions.

Definitions

The following definitions shall apply to the following words as they appear in **Enclosure A**:

1. The term "you" or "Respondent" shall mean Thomas H. Wright, III.
2. The term "person" shall have the same definition as in Section 101(21) of CERCLA: an individual, firm, corporation, association, partnership, consortium, joint venture, commercial entity, United States Government, State, municipality, commission, political subdivision of a State, or any interstate body.
3. The terms the "Site" or the "facility" shall mean and include the property on or about 333 Niels Eddy Road, Riegelwood, Columbus, North Carolina.
4. The term "hazardous substance" shall have the same definition as that contained in Section 101(14) of CERCLA and includes any mixtures of such pollutants and contaminants with any other substances. Petroleum products mixed with pollutants and contaminants are also included in this definition.
5. The term "hazardous waste" shall have the same definition as that contained in Section 1004(5) of the Resource Conservation and Recovery Act (RCRA).
6. The term "hazardous material" shall mean all hazardous substances, pollutants or contaminants, and hazardous wastes, as defined above.
7. The term "identify" means, with respect to a natural person, to set forth the person's name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.
8. The term "identify" means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (e.g., corporation, partnership, etc.), organization, if any, and a brief description of its business.
9. The term "identify" means, with respect to a document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.
10. The term "release" has the same definition as that contained in Section 101(22) of CERCLA, 42 U.S.C. Section 9601(22), and includes any spilling, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment, including the abandonment or discharging of barrels, containers, and other closed receptacles containing any hazardous substance or pollutant or contaminant.
11. The terms "document" and "documents" shall mean any object that records, stores, or presents information, and includes writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including by way of illustration and not by way of limitation, any invoice, manifest, bill of lading, receipt, endorsement, check, bank draft, canceled check, deposit slip, withdrawal slip, order, correspondence, record book, minutes, memorandum of telephone and other conversations including

meetings, agreement and the like, diary, calendar, desk pad, scrapbook, notebook, bulletin, circular, form, pamphlet, statement, journal, postcard, letter, telegram, telex, report, notice, message, analysis, comparison, graph, chart, interoffice or intra office communications, photostat or other copy of any documents, microfilm or other film record, any photograph, sound recording on any type of device, any punch card, disc or disc pack; any tape or other type of memory generally associated with computers and data processing (together with the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory and together with printouts of such punch card, disc, or disc pack, tape or other type of memory); and (a) every copy of each document which is not an exact duplicate of a document which it produces, (b) every copy which has any writing, figure or notation, annotation or the like on it, (c) drafts, (d) attachments to or enclosures with any document, and (e) every document referred to in any other document.

12. The terms "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.

13. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

14. All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, RCRA, 40 C.F.R. Part 300, or 40 C.F.R. Parts 260-280, in which case the statutory or regulatory definitions shall apply.

15. The term "property interest" means any interest in real property including but not limited to, any ownership interest, including an easement, any interest in the rental of property, any interest in a corporation that owns or rents or owned or rented property, and any interest as either the trustee or beneficiary of a trust that owns or rents, or owned or rented property.

16. The term "asset" shall include the following: real estate, buildings or other improvements of real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies, interests in partnerships, corporations and unincorporated companies, securities, patents, stocks, bonds, and other tangible as well as intangible property.

Information Request Questions

1. Identify the persons answering these questions on behalf of Respondent, including all persons consulted in answering these questions and the documents consulted, examined, or referred to in preparation of answering these questions. Provide true and accurate copies of all such relevant documents.
2. Summarize how Wright Chemical Corporation (WCC) and William Gilchrist Wright Properties, Inc. (WGWP) were capitalized upon their incorporation. For each company, provide:
 - (a) the identity of each person who purchased or subscribed to stock;
 - (b) the number of shares purchased or subscribed by each such person, and the number of total outstanding shares;
 - (c) the amount paid or promised for the shares purchased or subscribed by each such person and the dates of each such payment.
 - (d) if either the total outstanding shares or the percentage of shares owned by particular shareholders changed over time, explain and provide names and dates.
3. Identify each person who has served as a board member, officer, or management-level employee of WCC from February 20, 1959, through November 4, 2004. For each such person, provide:
 - (a) their full name, address, and telephone number;
 - (b) the name of the company for whom such person served as an officer or management-level employee;
 - (c) the offices or positions held and the applicable dates;
 - (d) the salary, benefits, and any other compensation paid to the person for each position; and,
 - (e) the duties and responsibilities of each position and the tasks performed both on an occasional and a day-to-day basis.
4. Identify each person who has served as a board member, officer, or management-level employee of WGWP from November 4, 2004, through December 10, 2015. For each such person, provide:
 - (a) their full name, address, and telephone number;
 - (b) the name of the company for whom such person served as an officer or management-level employee;
 - (c) the offices or positions held and the applicable dates;

- (d) the salary, benefits, and any other compensation paid to the person for each position; and,
- (e) the duties and responsibilities of each position and the tasks performed both on an occasional and a day-to-day basis.

5. Have you ever owned stock in WCC? If so, state:

- (a) the dates upon which you acquired shares;
- (b) the consideration paid or promised for the shares and the dates on which the consideration was paid or promised;
- (c) the number of shares owned, and the percentage of shares owned as measured against the total outstanding shares of WCC. If these amounts changed over time explain and provide dates; and,
- (d) the history of dividends and the dates on which dividends were received by you resulting from your ownership of capital stock in WCC.

6. Have you ever owned stock in WGWP? If so, state:

- (a) the dates upon which you acquired shares;
- (b) the consideration paid or promised for the shares and the dates on which the consideration was paid or promised;
- (c) the number of shares owned, and the percentage of shares owned as measured against the total outstanding shares of WGWP. If these amounts changed over time explain and provide dates; and,
- (d) the history of dividends and the dates on which dividends were received by you resulting from your ownership of capital stock in WGWP.

7. Identify each other person who has owned stock in WCC from February 20, 1959, through November 4, 2004. In your response, provide for each such person:

- (a) their full name, address, and telephone number;
- (b) the dates upon which the person acquired their shares;
- (c) the consideration paid or promised for the shares and the dates on which the consideration was paid or promised;
- (d) the number of shares owned, and the percentage of shares owned as measured against the total outstanding shares of WCC. If these amounts changed over time explain and provide names and dates; and,

- (e) the history of dividends received and the dates on which dividends were received resulting from ownership of capital stock in WCC.
8. Identify each other person who has owned stock in WGWP from November 4, 2004, through December 10, 2015. In your response, provide for each such person:
- (a) their full name, address, and telephone number;
 - (b) the dates upon which the person acquired their shares;
 - (c) the consideration paid or promised for the shares and the dates on which the consideration was paid or promised;
 - (d) the number of shares owned, and the percentage of shares owned as measured against the total outstanding shares of WGWP. If these amounts changed over time explain and provide names and dates; and,
 - (e) the history of dividends received and the dates on which dividends were received resulting from ownership of capital stock in WGWP.
9. Describe in detail each position you held with WCC from February 20, 1959, through November 4, 2004. For each position, state:
- (a) the offices or positions held and the applicable dates;
 - (b) the salary, benefits, and any other compensation paid to you;
 - (c) the duties and responsibilities both on an occasional and a day-to-day basis;
 - (d) the tasks you performed both on an occasional and a day-to-day basis;
 - (e) whether you ever had an on-Site office;
 - (f) whether you ever had any decision-making authority over the hazardous substances, hazardous wastes, or hazardous materials, used, purchased, generated, stored, treated, disposed, or otherwise handled at the Site. If not, identify everyone who had such authority;
 - (g) on average, how many days per week you spent at the Site; and,
 - (h) how many employees and/or contractors you supervised, oversaw, or managed.
10. Describe, in detail, each position you held with WGWP, from November 4, 2004, through December 10, 2015. For each position, state:

- (a) the offices or positions held and the applicable dates;
 - (b) the salary, benefits, and any other compensation paid to you;
 - (c) the duties and responsibilities both on an occasional and a day-to-day basis;
 - (d) the tasks you performed both on an occasional and a day-to-day basis;
 - (e) whether you ever had an on-Site office;
 - (f) whether you ever had any decision-making authority over the hazardous substances, hazardous wastes, or hazardous materials, used, purchased, generated, stored, treated, disposed, or otherwise handled at the Site. If not, identify everyone who had such authority;
 - (g) on average, how many days per week you spent at the Site; and,
 - (h) how many employees and/or contractors you supervised, oversaw, or managed.
11. Have you ever provided any training of any nature to any officer, director, or employee of WCC or WGWP? If so, for each training, provide:
- (a) a complete description of the training;
 - (b) who it was offered to;
 - (c) who participated in it;
 - (d) when and where it was conducted; and,
 - (e) the name of the company under which you conducted such training.
12. At any point in your tenure at WCC or WGWP, were you authorized to hire or fire employees of WCC? If so, state:
- (a) the name of the company and each position which gave you such authority;
 - (b) the applicable dates.
13. At any point in your tenure at WCC or WGWP, were you authorized to negotiate or enter into contracts with vendors or contractors concerning the handling of hazardous substances at and/or disposal of hazardous substances from the Site? If so, state:
- (a) the name of the company and each position which gave you such authority; and,

- (b) the applicable dates.
14. Identify any and all of your communications with federal, state, and local environmental regulators which have concerned environmental matters at the Site, including, but not limited to, permitting, violations, non-compliance, and inspections, during your tenure at WCC and WGWP. For each communication, provide:
- (a) a complete description of the communication;
 - (b) the nature (e.g. written, electronic, or verbal);
 - (c) the purpose;
 - (d) the persons involved in; and,
 - (e) the date of each such communication.
15. Identify all property, pollution and/or casualty liability insurance policies issued to WCC and WGWP from February 20, 1959, through the present. For each policy, state:
- (a) the name and address of each insurer and insured;
 - (b) the amount of coverage under each policy, and each policy number;
 - (c) the dates of coverage;
 - (d) a list of claims made against any of the policies (claim number and description of claim); and,
 - (e) provide copies of all relevant documents (e.g. declarations, and include all policies in their entirety).
16. Identify all property, pollution and/or casualty liability insurance policies issued to you from February 20, 1959, through the present. For each policy, state:
- (a) the name and address of each insurer and insured;
 - (b) the amount of coverage under each policy, and each policy number;
 - (c) the dates of coverage;
 - (d) a list of claims made against any of the policies (claim number and description of claim); and,
 - (e) provide copies of any relevant documents (e.g. declarations, and include all policies in their entirety).

17. Is WGWP still in business? If so, provide its principal place of business. Is WGWP still registered with the Secretary of State? Please state whether WGWP still has bank account(s), and if so with which financial institution(s). Please state whether WGWP is dissolved, the date of dissolution, how it was dissolved, by whom it was dissolved, and who maintains WGWP's corporate records.
18. If WGWP is dissolved, has it been liquidated? If so, provide the following:
- (a) state whether WGWP's creditors were provided notice of WGWP's dissolution and/or liquidation;
 - (b) state whether any assets were distributed upon dissolution and/or liquidation of WGWP. If so, state how many assets were distributed, whether any assets remain, and whether WGWP is fully liquidated;
 - (c) the identity of each person who received assets upon the dissolution and/or liquidation of WGWP;
 - (d) the value of the assets received by each such person;
 - (e) the applicable dates; and,
 - (f) provide any relevant documents (e.g. notice of dissolution, notice of liquidation, notice to creditors, newspaper notice, etc.).
19. Identify any legal or equitable property interest that you now have or previously had in the real property at or surrounding Site. In your response, state:
- (a) the nature of your interest;
 - (b) the applicable dates;
 - (c) how you acquired such interest; and,
 - (d) from who you acquired such interest.
20. Have you ever made a loan or extended a line of credit to WCC or WGWP?
- (a) the amount of the loan or value of the asset;
 - (b) a description of the loan or asset;
 - (c) applicable dates;
 - (d) your position at the time of the loan or line of credit;

- (e) the company to whom the loan or extended line of credit was made;
 - (f) the balance still owed to you, if any; and,
 - (g) provide copies of any relevant documents (e.g. loan agreement, promissory note, etc.).
21. Have you ever borrowed money from WCC or WGWP to secure a personal loan for yourself or establish a line of credit for yourself, whether or not such line has ever been drawn upon? If so, provide:
- (a) the amount of the loan or value of the asset;
 - (b) a description of the loan or asset;
 - (c) applicable dates;
 - (d) your position at the time of the loan or line of credit;
 - (e) the company you borrowed from;
 - (f) the balance still owed by you if any; and,
 - (g) provide copies of any relevant documents (e.g. loan agreement, promissory note, etc.).
22. Have you ever guaranteed or cosigned any obligation of WCC or WGWP?
- (a) the nature of the obligation;
 - (b) the total amount of the obligation;
 - (c) the date on which you guaranteed or cosigned the obligation; and,
 - (d) provide copies of any relevant documents (e.g. loan agreement, promissory note, etc.).
23. Has WCC or WGWP ever guaranteed or cosigned any of your obligations?
- (a) the nature of the obligation;
 - (b) the total amount of the obligation;
 - (c) the date on which you guaranteed or cosigned the obligation;
 - (d) the company that guaranteed or cosigned the loan; and,
 - (e) provide copies of any relevant documents (e.g. loan agreement, promissory note, etc.).

24. Regarding the Asset Purchase Agreement between WCC and Messrs. Oakley and Barker dated November 4, 2004, for the purchase of WCC's assets, please provide the following:
- (a) the amount you received of the (b) (4) purchase price; how such funds were distributed; identify all financial institutions and accounts to which such funds were transferred including amounts and dates; and provide copies of financial and accounting documentation indicating disposition of the money;
 - (b) a narrative summary and documentation accounting for money spent;
 - (c) identify all financial institutions and accounts into which the (b) (4) due to you under the 2004 Asset Purchase Agreement was transferred, including amounts and dates; and provide copies of financial and accounting documentation indicating disposition of the money;
 - (d) a narrative summary and documentation accounting for money spent;
 - (e) identify all financial institutions and accounts into which the (b) (4) due to you under the 2004 Asset Purchase Agreement was transferred, including amounts and dates; and provide copies of financial and accounting documentation indicating disposition of the money;
 - (f) a narrative summary and documentation accounting for money spent;
 - (g) a description of the disposition of WCC's excluded assets of (b) (4) from the 2004 Asset Purchase Agreement. Provide Board meeting notes and other contemporaneous documentation explaining disposition of these excluded assets. To the extent that these assets were liquidated and distributed amongst shareholders, provide names, addresses, phone numbers, amounts received, and dates;
 - (h) to the extent that you received cash distributions for WCC's excluded assets under the 2004 Asset Purchase Agreement, please identify all financial institutions and accounts receiving that money, amounts, and dates;
 - (i) a narrative summary and documentation accounting for money spent; and,
 - (j) appropriately labeled contemporaneous supporting documentation for all your answers.
25. List all real property you have ever owned including but not limited to real property in New Hanover County, North Carolina.
- (a) for each parcel include address, whether it is commercial or residential, the date of purchase and purchase price, the date of sale and sale price.
26. The Asset Purchase Agreement between WCC and Messrs. Oakley and Barker dated November 4, 2004, references Quality Chemicals Laboratories (QCL) located in New Hanover County,

North Carolina. Please identify any employees, officers, managers, and/or majority shareholders of QCL that were in any way connected with WCC. Describe the nature of that connection and provide details.

27. Identify each person who owned stock in QCL from its inception through the duration of its corporate existence. For each such person provide:
- (a) their full name, address, and telephone number;
 - (b) the dates on which the person acquired their shares;
 - (c) the consideration paid or promised for the shares, and the dates on which the consideration was paid or promised;
 - (d) the number of shares owned, and the percentage of shares owned as measured against the total outstanding shares of QCL;
 - (e) if either the total outstanding shares of QCL or the percentage of shares owned by individual shareholders changed over time, explain those changes, and provide names and dates;
 - (f) the history of dividends and the dates on which dividends were received by shareholders of QCL. Include names, dates, and amounts; and
 - (g) provide copies of any relevant documents.
28. Is QCL still in business? If so, provide its principal place of business. If not, was QCL sold or liquidated? If it was liquidated, provide the following:
- (a) state whether QCL's creditors were provided notice of QCL's dissolution and/or liquidation;
 - (b) state whether any assets were distributed upon dissolution and/or liquidation of QCL. If so, state how many assets were distributed, whether any assets remain, and whether QCL is fully liquidated;
 - (c) the identity of each person who received assets upon the dissolution and/or liquidation of QCL;
 - (d) the value of the assets received by each such person;
 - (e) the applicable dates; and,
 - (f) provide any relevant documents (e.g. notice of dissolution, notice of liquidation, notice to creditors, newspaper notice, etc.).

29. If QCL was sold, please provide the following:
- (a) provide documents memorializing the sale/purchase of assets of QCL;
 - (b) state what amount you received from the sale of QCL's assets, including amounts, and dates.
 - (c) identify all financial institutions and accounts receiving that money, amounts, and dates.
 - (d) provide a narrative summary and documentation accounting for money spent.
 - (e) state how all assets were distributed upon sale of QCL. Provide the identity of each person who received assets upon the sale of QCL;
 - (f) the value of the assets received by each such person;
 - (g) the applicable dates; and,
 - (h) provide any relevant documents.
30. Have you ever received bonuses, and/or extra funds, or assets, in addition to your annual salary, during your tenure at WCC? If so, please provide:
- (a) dates on which such bonuses were received, the amounts of such bonuses, and identify all financial institutions and accounts receiving such bonuses;
 - (b) a narrative summary and documentation accounting for money spent; and,
 - (c) appropriately labeled contemporaneous documentation supporting all your answers.
30. Have you ever received bonuses during your tenure at WGWP? If so, please provide:
- (a) dates on which such bonuses were received, amounts of such bonuses, and identify all financial institutions and accounts receiving such bonuses;
 - (b) a narrative summary and documentation accounting for money spent; and,
 - (c) appropriately labeled contemporaneous documentation supporting all your answers.
31. Have you ever received bonuses during your tenure at QCL? If so, please provide:
- (a) dates on which such bonuses were received, amounts of such bonuses, and identify all financial institutions and accounts receiving such bonuses;
 - (b) a narrative summary and documentation accounting for money spent; and,

(c) appropriately labeled contemporaneous documentation supporting all your answers.

32. Provide all WCC's Board meeting notes from 2000 through 2004.
33. Provide all WGWP's Board meeting notes from 2004 through 2008.
34. Provide all QCL's Board meeting notes from 2004 through 2008.
35. Provide copies of WGWP's financial statements and profit and loss statements for the years 2010 through 2015.
36. Provide copies of WGWP's annual reports, internal and external financial statements, or projections prepared for the years 2010 through 2015.
37. Provide copies of WGWP's signed federal and state tax returns, including schedules and attachments, for the years 2010 through 2015.
38. Provide copies of QCL's financial statements and profit and loss statements for the last 5 years that you were a shareholder of the company.
39. Provide copies of QCL's annual reports, internal and external financial statements, or projections prepared for the last 5 years that you were a shareholder of the company.
37. Provide copies of QCL's signed federal and state tax returns, including schedules and attachments, for the last 5 years that you were a shareholder of the company.
38. To determine your financial ability to pay, complete the Individual Financial Data Request Form attached hereto and provide true and accurate copies of your signed federal and state tax returns, including schedules and attachments, for the preceding five (5) years (2015 to 2019), and for the years 2004 through 2008.



Individual Ability To Pay Claim

Financial Data Request Form

This form requests information regarding your financial status. The data will be used to evaluate your ability to pay for environmental cleanup or penalties. If you need more space for your answers, please attach additional sheets of paper. Note that further documentation may be requested for any of your responses. Any other information you wish to provide supporting your case is welcome, particularly if you feel your situation is not adequately described through the information requested here.

Name:	
Spouse's Name:	
Address:	
County of Residence:	

PART I. BACKGROUND INFORMATION

1. MEMBERS OF HOUSEHOLD (List the head of the household and all persons living with you)			
Name	Age	Relationship to Head of Household	Currently Employed?

2. EMPLOYMENT (List all jobs held by applicant and spouse.)			
Name	Employer	Length of Employment	Annual Salary

3. INCOME (List all income earned by persons in household. If members of the household other than the applicant and spouse earn income, please itemize on separate page.)

Source	Gross (Pre-Tax)		Period of Payment (check one)			
	Applicant	Spouse	Weekly	Monthly	Quarterly	Yearly
Wages/Salaries						
Sales Commissions						
Investment Income (interest, dividends, capital gains, etc.)						
Net Business Income						
Rental Income						
Retirement Income (Pension, Social Security, etc.)						
Child Support						
Alimony						
Other Income (please itemize)						

PART II. CURRENT LIVING EXPENSES

Please list personal living expenses which were typical during the last year and indicate if any of these values are likely to change significantly in the current year. Please do not include business expenses. If you are the owner of an operating business, please attach any available financial statements.

Expense	Amount	Period of Payment (check one)				For Agency Use Only
		Weekly	Monthly	Quarterly	Yearly	
A. Living Expenses						
1. Rent						
2. Home maintenance						
3. Auto fuel maint./other transp. other transportation						
4. Utilities						
a. Fuel (gas,oil,wood,propane)						
b. Electric						
c. Water/sewer						
d. Telephone						
5. Food						
6. Clothing, personal care						
7. Medical costs						
B. Debt Payments						
1. Mortgage payments						
2. Car payments						
3. Credit card payments						
4. Educational loan payments						
C. Insurance						
1. Household insurance						
2. Life insurance						
3. Automobile insurance						
4. Medical insurance						
D. Taxes						
1. Property taxes						
2. Federal income taxes						
3. State income taxes						
4. FICA						
E. Other Expenses						
1. Childcare						
2. Current School tuition/expenses						
3. Legal or professional services						
4. Other (itemize on separate page)						
Total Current Expenses						

PART III. NET WORTH

Please provide the following information to the best of your ability. Data should be as current as possible. Estimates are acceptable; if you wish note such items with an "E". If you are the sole proprietor of a business, please list business assets and liabilities to the extent that the information sought is not already provided in your tax returns, in addition to personal assets and liabilities. Please mark these entries with a "B" to identify them as business assets and liabilities.

1. BANK ACCOUNTS (Checking, NOW, Savings, Money Market, CDs etc.)		
Name of Bank or Credit Union	Type of Account	Current Balance
For Agency Use Only - Total Current Balance in Bank Accounts		

2. INVESTMENTS (Stock, Bonds, Mutual Funds, Options, Futures, Real Estate Investment Trusts (REIT), etc.)		
Investment	Number of Shares or Units	Current Market Value
For Agency Use Only - Total Current Market Value of Investments		

3. RETIREMENT FUNDS AND ACCOUNTS (IRA, 401(k), Keogh, vested interest in company retirement fund, etc.)

Description of Account	Estimated Market Value
For Agency Use Only - Total Estimated Market Value of Retirement Funds and Accounts	

4. LIFE INSURANCE POLICIES (Whole Life, Universal Life, etc.)

Policy Holder	Issuing Company	Policy Value	Cash Value
For Agency Use Only - Total Value of Life Insurance Policies			

5a. VEHICLES USED FOR COMMUTING PURPOSES

(Cars, Trucks, Motorcycles, etc. Only list up to two vehicles used for commuting purposes.)

Model/Year	Estimated Market Value	Loan (if any) Owed to:	Balance Due:	Start Date	End Date
For Agency Use Only - Total Estimated Market Value of Vehicles					

5b. OTHER VEHICLES (Cars, Trucks, Motorcycles, Recreational Vehicles, Motor Homes, Boats, Airplanes etc.) Attach separate sheets, if necessary.

Model/Year	Estimated Market Value	Loan (if any) Owed to:	Balance Due:	Start Date	End Date
For Agency Use Only - Total Estimated Market Value of Vehicles					

6. PERSONAL PROPERTY (Household Goods and Furniture, Jewelry, Art, Antiques, Collections, Precious Metals, etc. Only list items with a value greater than \$500.00)

Type of Property	Estimated Market Value	Loan (if any) Owed to:	Balance Due:	Start Date	End Date
For Agency Use Only - Total Estimated Market Value of Personal Property					

7a. REAL ESTATE — PRIMARY RESIDENCE (Home — List only one such residence.)

Location & Description of Property	Estimated Market Value	Mortgage (if any) Owed to:	Balance Due:	Start Date	End Date
For Agency Use Only - Total Estimated Market Value of Real Estate					

7b. OTHER REAL ESTATE (Land, Buildings, Land with Buildings)

Location & Description of Property	Estimated Market Value	Mortgage (if any) Owed to:	Balance Due:	Start Date	End Date
For Agency Use Only - Total Estimated Market Value of Real Estate					

8. OTHER ASSETS					
Type of Asset	Estimated Market Value	Loan (if any) Owed to:	Balance Due:	Start Date	End Date
For Agency Use Only - Total Other Assets					

9. CREDIT CARDS AND LINES OF CREDIT		
Credit Card/Line of Credit (Type)	Owed To	Balance Due
For Agency Use Only - Total Balance Due on Credit Cards and Lines of Credit		

10. OTHER DEBT (Amounts due to individuals, Fixed obligations, Taxes Owed, Overdue Alimony or Child Support, etc.)				
Type of Debt	Owed To	Balance Due	Start Date	End Date
For Agency Use Only - Total Balance Due on Other Debt				

PART IV. ADDITIONAL INFORMATION

Please respond to the following questions. For any question that you answer "Yes," please provide additional information on separate pages or at the bottom of this page.

QUESTION		YES	NO
1.	Do you have any reason to believe that your financial situation will change during the next year?		
2.	Are you currently selling or purchasing any real estate?		
3.	Is anyone (or any entity) holding real or personal property on your behalf (e.g. a trust)?		
4.	Do you hold partnership interest in a partnership or own/share ownership in a corporation?		
5.	Are you a party in any pending lawsuit?		
6.	Have any of your belongings been repossessed in the last three years?		
7.	Are you a Grantor, Trustee, Executor, or Administrator? If you are a Grantor, submit copy of trust as well the attachments & schedules.		
8.	Are you a participant or beneficiary of an estate or profit sharing plan?		
9.	Have you declared bankruptcy in the last seven years?		
10	Do you receive any type of federal aid or public assistance?		

VERIFICATION AND AFFIDAVIT

Under penalties of perjury, I declare that this statement of assets, liabilities, and other information is true, correct, and complete to the best of my knowledge and belief. I further understand that I will be subject to prosecution by the U.S. Environmental Protection Agency to the fullest extent possible under the law should I provide any information that is not true, correct, and complete to the best of my knowledge.

Date: _____

Name

Signature